



Instruction

Personnel Performance Evaluations

1. Purpose and Scope

This instruction clarifies and standardizes procedures to be followed by certifying agents accredited by the U.S. Department of Agriculture (USDA) National Organic Program (NOP) when conducting personnel performance evaluations. This instruction is directed at certifying agents, who must satisfy additional USDA requirements as part of their accreditation. (See 7 C.F.R. § 205.501(a)(21).) Certifying agents that employ contracted personnel to perform certification duties are also affected by this instruction.

2. Background

Section 205.501(a)(6) of the USDA organic regulations (7 C.F.R. § 205.501(a)(6)) requires that certifying agents conduct annual performance evaluations of all persons who review applications for certification, perform onsite inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services. This instruction establishes the minimum requirements for conducting certification personnel performance evaluations.

3. Policy and Procedure

A certifying agent must conduct annual personnel performance evaluations and implement measures to correct any deficiencies in certification services. (See § 205.501(a)(6).)

3.1 Personnel

Certifying agents must conduct annual performance evaluations of personnel and contract staff that perform any of the following roles:

- a. Review applications and certification documents;
- b. Inspect operations;
- c. Evaluate qualifications for certification; and
- d. Make certification decisions or make recommendations concerning certification decisions.

3.2 Evaluation Criteria

Certifying agents conducting performance reviews should use the following kinds of evaluation criteria:

- a. Performance criteria
 - i. Knowledge, Skills, and Abilities



Defined competency system that assesses technical and interpersonal competencies, including whether personnel have sufficient expertise in organic production or handling techniques, the ability to work competently and effectively with clients and colleagues, and knowledge of the USDA organic regulations applicable to perform the duties assigned.

ii. Responsibilities

Personnel engage in timely planning, preparation, and follow-up of certification activities. This may include time management, deliverable review quality, and completeness of work.

b. Field Evaluation (Inspectors only)

Field evaluations involve evaluating inspectors while they are conducting inspections and are considered the most effective method to assess inspector performance. Each inspector should be subject to a regular field evaluation. The field evaluation system should be developed using best practices, such as a risk-based approach (i.e., inspector experience, annual number of inspections, work product assessment, etc.) or another approach sufficient to determine inspector competency. Inspectors who have demonstrated full competency may be field evaluated less regularly but still require an annual performance evaluation.

- i. Field evaluations should be conducted at the certifying agent's expense.
- ii. Certifiers may use the field evaluation of another accredited certifier. If a certifier chooses to do this, it must review the evaluation to ensure a complete and thorough evaluation is conducted. It is each certifier's responsibility to ensure that its inspectors, both staff and contractors, comply with the USDA organic regulations.
- iii. Certifiers may submit alternative proposals for field evaluation to their Accreditation Manager.

c. Supervisor or Peer Review

A process for delivering performance feedback that includes both written and verbal feedback with personnel at least annually. This review should include both observations on past performance during the previous period and a performance plan to guide development and improvement in the upcoming period.

Each year certifying agents must confirm that all personnel, including contracted staff and inspectors that were field evaluated by other entities, meet performance criteria that they have established. If personnel have not met the performance criteria, then the certifying agent must implement measures to correct any deficiencies in certification services.

4. References

USDA Organic Regulations (7 CFR Part 205)

§ 205.501 General requirements for accreditation.



(a) A private or governmental entity accredited as a certifying agent under this subpart must:

...

(6) Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services.